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Attorneys for APG Financial, Inc.

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IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

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In re: NATALIE NICOLE BUYS  Debtor.	Bankruptcy Case No. 14-25966  (Chapter 7)  Judge William T. Thurman
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**NOTICE OF MOTION AND NOTICE OF OPPORTUNITY FOR HEARING ON  
MOTION OF APG FINANCIAL, INC. FOR RELIEF FROM AUTOMATIC STAY**

**(Objection Deadline: November 10, 2014)**

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PLEASE TAKE NOTICE that APG Financial, Inc. (“APG”), pursuant to 11 U.S.C. § 362 and Rule 4001 of the Federal Rules of Bankruptcy Procedure and Local Rule 4001-1, has filed its Motion for Relief From Automatic Stay (the “Motion”). A copy of the Motion accompanies this Notice.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in the bankruptcy case. If you do not have an attorney, you may wish to consult one.

The Motion provides that APG will be given relief from the automatic stay in order to pursue its rights against a 2006 Chevrolet Cobalt (VIN # 1G1AK15F66784292) (the "Vehicle").

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE COURT ON OR BEFORE THE OBJECTION DEADLINE SET FORTH BELOW.

If you do not want the Court to grant the relief requested in the Motion then:

(1) on or before **November 10, 2014**, you or your lawyer must file with the Bankruptcy Court a written objection to the Motion explaining your position at:

United States Bankruptcy Court  
350 South Main Street, Room 301  
Salt Lake City, UT 84101

If you mail your objection to the Bankruptcy Court for filing you must mail it early enough so that the Court will **receive** it on or before November 10, 2014. You must also mail a copy of your objection to counsel for APG at the following address:

Parr Brown Gee & Loveless  
Chad S. Pehrson  
201 South 700 East, Suite 700  
Salt Lake City, Utah 84111

(2) attend the hearing on the Motion which is set for November 17, 2014, at 11:00 a.m. in Courtroom 376, United States Bankruptcy Court, 350 South Main Street, Salt Lake City, Utah 84101. **There will be no further notice of the hearing** and failure to attend the hearing will be deemed a waiver of your objection.

If you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief requested in the Motion. In the absence of a timely filed objection, the undersigned counsel may and will ask the Court to strike the hearing and enter an order approving the Motion without a hearing.

DATED this 22nd day of October 2014.

PARR BROWN GEE & LOVELESS

/s/ Chad S. Pehrson

Chad S. Pehrson

Attorneys for APG Financial, Inc.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was served this 22nd day of October 2014, by the Court's CM/ECF electronic transmission or by United States mail on the following:

John Bagley (CM/ECF)

Elizabeth R. Loveridge, trustee (CM/ECF)

United States Trustee (CM/ECF)

Natalie Nicole Buys (US MAIL)  
477 N. 7<sup>th</sup> Street  
Tooele, UT 84074

Utah Department of Transportation (US MAIL)  
4501 South 2700 West  
PO Box 148455  
SLC UT 84114

Art Institute of Salt Lake (US MAIL)  
121 West Election Road  
Suite 100  
Draper, UT 84020

Capital One (US MAIL)  
PO Box 30281  
Salt Lake City, UT 84130

Checkpoint One (US MAIL)  
324 N. Main St.  
Tooele, UT 84074

Ear Nose Throat Center (US MAIL)  
756 East 12200 South  
Draper, UT 84020

Enhanced Acquisitions (US MAIL)

3840 E. Robinson Rd.  
Suite 353  
Buffalo, NY 14228

Express Recovery Services (US MAIL)  
PO Box 26415  
Salt Lake City, UT 84126

Federal Loan Servicing (US MAIL)  
PO Box 60610  
Harrisburg, PA 17106

Heritage West Credit Union (US MAIL)  
430 E Main St  
Grantsville, UT 84029

Knight Adjustment Bureau (US MAIL)  
823 E. 400 S.  
Salt Lake City, UT 84102

Mountain Loan Centers, Inc. (US MAIL)  
1251 E. 100 S.  
Saint George, UT 84790

Mountain Medical Physicians (US MAIL)  
5444 S. Green Street  
Salt Lake City, UT 84123

Mountain West Anesthesia (US MAIL)  
PO Box 3570  
Salt Lake City, UT 84110-3570

Mountain West Medical Center (US MAIL)  
2055 N Main St  
Tooele, UT 84074

Noble Finance (US MAIL)  
134 W 1180 N # 13  
Tooele, UT 84074

Security Finance Service (US MAIL)  
PO Box 3146  
Spartanburg, SC 29304

Todd Bremer & Lawson (US MAIL)  
PO Box 36788  
Rock Hill, SC 29732

USA Cash Services (US Mail)  
4901 S State St  
Ste D  
Salt Lake City, UT 84107

US Department of Education (US MAIL)  
PO Box 4222  
Iowa City, IA 52244

Verizon Wireless (US MAIL)  
PO Box 26055  
Minneapolis, MN 55426

/s/ Chad S. Pehrson